

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ROBERT H. KOONS, JR. and SALLY KOONS, his wife,	:	
	:	CIVIL ACTION
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	JURY TRIAL DEMANDED
PIEDMONT HAWTHORNE AVIATION,	:	
HAWTHORNE A-B-E, INC., n/k/a	:	
HAWTHORNE AIRPORT SERVICES, INC.,	:	
and PIEDMONT HAWTHORNE	:	
HOLDINGS, INC.	:	No. 02CV2739
	:	
Defendants.	:	

**PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION IN LIMINE
TO LIMIT MEDICAL EXPENSES TO THE AMOUNT ACTUALLY PAID
AND ACCEPTED AS FULL PAYMENT FOR SERVICES RENDERED**

Defendant Piedmont Hawthorne moves this Court for an Order limiting medical expenses actually paid by health care insurance providers. As the parties discussed in Chambers during the Pretrial Conference, plaintiffs agree to only request payment of past medical expenses that were paid by health insurance providers and other medical expenses permitted by the Pennsylvania Supreme Courts ruling in Morehead v. Crozer Chester Med. Center, 564 Pa 156, 765 A.2d 786 (2001). Therefore, plaintiffs request the Court to deny defendants' Motion, find it moot or, in the alternative, delay disposition of this motion until

the parties had an opportunity to agree to a stipulated amount of medical damages.

Respectfully submitted,

WOLK & GENTER

BY: _____
Arthur Alan Wolk, Esquire
Attorney I.D.: 02091
Richard E. Genter, Esquire
Attorney I.D.: 30419
Christopher J. Cerski, Esquire
Attorney I.D.: 89611
1710-12 Locust Street
Philadelphia, PA 19103
(215) 545-4220
Attorneys for Plaintiffs